

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

**KEITH KENDRICK, MARK GUGLIUZZA,
and LIANNE GUGLIUZZA,**

Plaintiffs,

v.

**JASON LYBERGER and SWIFT
TRANSPORTATION CO. OF ARIZONA, LLC,**

Defendants.

**CIVIL ACTION FILE NO:
4:21-cv-00140-WTM-CLR**

**DEFENDANT SWIFT TRANSPORTATION CO. OF ARIZONA, LLC'S
SUPPLEMENTAL DESIGNATION OF EXPERTS**

COMES NOW Defendant SWIFT TRANSPORTATION CO. OF ARIZONA, LLC, one of the named defendants in the above-styled matter (hereinafter "Swift" or "Defendant"), and pursuant to Fed. R. Civ. P. 26(a)(2), discloses its expert witnesses who may testify under Rules 702, 703, or 704, showing the Court as follows:

- 1. Henry J. Krebs, III, MD
Southeastern Imaging & Interventional Associates, LLC
600 Celebrate Life Parkway
Newnan, GA 30265
(770) 400-6008**

Defendants hereby supplement their response to disclose and designate Dr. Krebs as an expert who will offer testimony as to both Mark Gugliuzza and Lianne Gugliuzza's medical treatment and conditions. Dr. Krebs' testimony history and billing records are attached hereto as Exhibit A. Dr. Krebs' report regarding Lianne Gugliuzza is attached as Exhibit B.

- 2. Matthew W. Norman, M.D.
4401 Northside Parkway, NW
Suite 225
Atlanta, GA 30327
(404) 495- 5900**

Defendants hereby designate Dr. Matthew Norman. Dr. Norman is a Board-Certified Psychiatrist. A copy of Dr. Norman's curriculum vitae is attached herewith as Exhibit C. Dr. Norman is expected to testify based on his opinions contained in his report attached herewith as Exhibit D. Dr. Norman's billing rates and testimonial history are attached as Exhibit E.

Dr. Norman is expected to testify based on his education, training and experience in the field of psychiatry. Defendants anticipate Dr. Norman will base his testimony and opinions, in whole or part, on the following: education, training, and experience in the field of psychiatry, review of discovery materials either produced to date or will be produced prior to trial, and evidence including depositions that have either taken place to take or will take place prior to trial.

This disclosure does not limit Dr. Norman's testimony or opinions to these or other subjects. Defendants reserve the right to add, supplement, or otherwise amend the opinions of Dr. Norman through additional disclosures and/or deposition testimony.

3. Whitney G. Morgan
P.O Box 531195
Birmingham, Alabama 3523-1195
(205) 871- 4455

Defendants also identify Whitney G. Morgan as an expert on the Federal Motor Carrier Safety Regulations, U.S. Department of Transportation Regulations. Mr. Morgan is expected to testify based on his education, training, and experience, as outlined in his CV (attached as Exhibit F), as well as his review of the materials as outlined in his report, attached as Exhibit G. Also attached as Exhibit H are Mr. Morgan's billing rates and testimonial history. This disclosure does not limit Mr. Morgan's testimony or opinions to these or other subjects. Defendants reserve the right to add, supplement, or otherwise amend the opinions of Mr. Morgan through additional disclosures and/or deposition testimony.

This 30th day August, 2022.

HAWKINS PARNELL & YOUNG, LLP

/s/ Allison M. Escott

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Georgia Bar No. 606031
Counsel for Defendants

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CERTIFICATE OF SERVICE

This is to certify that I have this day served all counsel of record in the foregoing matter with a copy of **DEFENDANT SWIFT TRANSPORTATION CO. OF ARIZONA, LLC'S SUPPLEMENTAL DESIGNATION OF EXPERTS** via the Court's electronic filing system as follows:

Seth M. Diamond, Esq.
Morgan & Morgan.
25 Bull St., Ste. 400
Savannah, GA 31401
sdiamond@forthepeople.com
Counsel for Plaintiff

This 30th day of August, 2022.

HAWKINS PARNELL & YOUNG, LLP

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/s/ Allison M. Escott

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Counsel for Defendants